

IH-32

Rev: 2014-1

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

Mazlin Trading Corp. and Shireen Maritime Ltd,

Plaintiff	Case Number
vs.	1:19-cv-07652
WJ Holding Ltd, Stubrik Limited, and Yuri Drukker	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

WJ Holding Limited and Strubrik Limited

Plaintiff	Case Number
vs.	1:19-cv-07426
Shireen Maritime Ltd, Mazlin Trading Corp, AMM Consulting and Management Group LLC, and Alexander Spiegel,	
Defendant	

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## Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The "Earlier Case" was commenced on July 5, 2019.

The proceeding is currently in the service of pleadings staged, as the majority of the docket only has entries for "Summons Issued" or "Request for Issuance of Summons".

No Defendant has answered.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Alex Spiegel, the owner of Mazlin Trading Corp. and Shireen Maritime Ltd. ("Mazlin and Shireen") and Plaintiff in the first Action referenced above with the Index No.: 1:19-cv-07652, over the course of 25 years lent approximately \$40 million to companies controlled by his longtime friend Yuri Drukker, including WJ Holding Limited and Strubrik Limited ("WJ Holding and Stubrick"), Plaintiff in the second Action referenced above with the Index No.: 1:19-cv-07426.

In or about 2011, Mr. Drukker parted company from his former business partners, after which he was left in sole ownership of WJ Holding, and through it the Bender Oil plant, a vegetable oil production facility in the Transdnistrian region of Moldova. The plant had not been operational for about six (6) years, but Mr. Drukker had plans to revive its production and turn it to profit. He approached Mr. Spiegel to assist with the financing. To achieve this end, the parties negotiated and executed the Loan Agreements, whereby Mazlin and Shireen would advance funds to WJ Holding and Stubrick in fixed minimum amounts or multiples thereof, to be repaid on dates certain subject to interest that would increase upon late payment. WJ Holding and Stubricks never paid back money to Mazlin and Shireen that was advanced to them in 2012 and 2013.

On November 21, 2016, Mazling and Shirren requested arbitration under the London Court of International Arbitration ("LCIA"). On March 3, 2017, in preparation for LCIA arbitration in London, pursuant to the Loan Agreements, Petitioner obtained a world-wide freezing order/injunction against WJ Holding and Stubrick in the amount of \$11,429,776, in the District Court of Nicosia, Cyprus, where both companies maintain their registered offices and hold many assets. On January 23, 2018, LCIA entered the Awards in favor of Mazlin and Shireen and against WJ Holdings and Stubricks. The total amount of the relief granted from both Awards totals \$14,040,978.50, including interest accrued to date. To date, the Respondents have not paid any amount pursuant to the Awards and continue to prosecute the New York State Matter.

Meanwhile, WJ Holding had previously entered into an agreement with the Transdnistrian Moldovian Republic ("2012 Privatization Agreement") regarding the Bender Oil plant, the commercial purposes of which failed in or around 2015. This agreement was not realized, the privatization license was not issued, and Bender Oil failed in or around 2015. WJ Holding blamed the failure of the 2012 Privatization Agreement on the Transdnistrian Moldovian Republic ("TMR") for what it claimed were breaches of the agreement. WJ Holding filed for arbitration with the International Court of Arbitration of the International Chamber of Commerce ("ICC") in Paris, France. On or about June 8, 2018, the ICC awarded WJ Holding approximately \$9,807,336 against the TMR. On July 05, 2019, WJ Holding filed a Petition to Enforce the Arbitration Award in its favor against the TMR in this Court. That action is styled WJ Holding Limited v. Transdnistrian Moldovian Republic, et al., Case 1:19-cv-06260, and is pending in the District Court of the United States for the Southern District of New York.

Signature: /s/ Michael J. Smikun, Date: 08/21/19

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